

Exhibit 1

Cardoza, Michael L.

From: Cook, Christopher T.
Sent: Friday, June 7, 2024 9:50 AM
To: Juliano, Anthony M.
Cc: Scruton, Sarah M.; Marks, Jonathan L.; Cardoza, Michael L.
Subject: RE: State Farm v. Metro Pain Specialists P.C., et al. - 1:21-cv-05523 (E.D.N.Y.) - Defendants ESI Production
Attachments: Doc 513 - Letter From Christopher T. Cook And Anthony M. Juliano re Status Of Compliance With Orders To Show Cause.pdf

Anthony,

Following up on the ESI productions received 5/24, discovery material was produced on behalf of only one of the defendants at issue in the Court's original order (Hackensack Specialty ASC LLC). See 2/22/2024 Minute Entry & Order re Joint Ltr. at Dkt. 513. Per the Court's order of 5/29, we understand your clients will be producing all remaining ESI by June 14, 2024 (original so-ordered deadline of April 8). If your clients intend to seek additional time to complete these productions, Plaintiffs request defendants prioritize production of communications associated with Yan Moshe and Reuven Alon by the June 14 deadline, including the responsive communications identified in Plaintiffs' second sets of document demands directed to these individual defendants.

Please advise (1) whether by June 14 Moshe and Alon will produce all outstanding ESI for at least the following email accounts: yanmoshe@yahoo.com, ym@hudsonregionalhospital.com, rob7188090097@yahoo.com, robalon@me.com, robalon@beshert.net, robalon.beshert@gmail.com, pa.robalon@gmail.com, beshert.scheduling@gmail.com, marina.beshert@gmail.com, msimon.beshert@gmail.com, torres.beshert@gmail.com, k.beshert@gmail.com, and jaimie.beshert@gmail.com; and (2) whether Moshe and Alon will serve by close of business today written responses to Plaintiffs' second sets of document demands, originally due on May 24 and 29, and if not, a date certain by which they will do so.

Regards,
Chris

Christopher T. Cook
Counsel

Katten

Katten Muchin Rosenman LLP
50 Rockefeller Plaza | New York, NY 10020-1605
direct +1.212.940.6488
christopher.cook@katten.com | katten.com

From: Juliano, Anthony M. <ajuliano@bracheichler.com>
Sent: Wednesday, May 29, 2024 12:03 PM
To: Cardoza, Michael L. <michael.cardoza@katten.com>; 'Joseph D'Agostino' <JDAgostino@fdnylawfirm.com>; Peter Birzon <pbirzon@pbalaw.net>; 'Byron Divins' <bdivins@capetoladivinslaw.com>; 'Thomas A. Leghorn' <tleghorn@londonfischer.com>; 'Benjamin M. Pinczewski' <bmp@psattorney.com>; Alexandra Mule <amule@capetoladivinslaw.com>; aja@schlawpc.com; ozareh@wzmplaw.com; Ross Keiser <rkeiser@londonfischer.com>; Elyse Schindel <eschindel@londonfischer.com>; mac@schlawpc.com; reh@schlawpc.com; NTorczyner@hkplaw.com; sharfenist@hkplaw.com; Connor McHugh <cMcHugh@fdnylawfirm.com>; 'Jake Lader' <jlader@hkplaw.com>
Cc: Cook, Christopher T. <christopher.cook@katten.com>; DeYoung, Stephen P. <stephen.deyoung@katten.com>;

Scruton, Sarah M. <sarah.scruton@katten.com>; Marks, Jonathan L. <jonathan.marks@katten.com>

Subject: State Farm v. Metro Pain Specialists P.C., et al. - 1:21-cv-05523 (E.D.N.Y.) - Defendants ESI Production

EXTERNAL EMAIL – EXERCISE CAUTION

Counsel:

I am resending the second batch of ESI production with a new Bates label (CITISURG) as the prior bates label had already been used. Password remains the same.

Anthony

https://app.everlaw.com/51126/dl/EH6WpnG0a9pOE_wbQFT7YEcmGp1mOntchSjOOi5nLAZc

Anthony M. Juliano, Esq.

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New York City | Roseland | Palm Beach

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From: Juliano, Anthony M. <ajuliano@bracheichler.com>

Sent: Friday, May 24, 2024 1:42 PM

To: Cardoza, Michael L. <michael.cardoza@katten.com>; 'Joseph D'Agostino' <JDAgostino@fdnylawfirm.com>; Peter Birzon <pbirzon@pbalaw.net>; 'Byron Divins' <bdivins@capetoladivinslaw.com>; 'Thomas A. Leghorn' <tleghorn@londonfischer.com>; 'Benjamin M. Pinczewski' <bmp@psattorney.com>; Alexandra Mule <amule@capetoladivinslaw.com>; aja@schlawpc.com; ozareh@wzmplaw.com; Ross Keiser <rkeiser@londonfischer.com>; Elyse Schindel <eschindel@londonfischer.com>; mac@schlawpc.com; reh@schlawpc.com; NTorczyner@hkplaw.com; sharfenist@hkplaw.com; Connor McHugh <cMcHugh@fdnylawfirm.com>; 'Jake Lader' <jlader@hkplaw.com>

Cc: Cook, Christopher T. <christopher.cook@katten.com>; DeYoung, Stephen P. <stephen.deyoung@katten.com>; Scruton, Sarah M. <sarah.scruton@katten.com>; Marks, Jonathan L. <jonathan.marks@katten.com>

Subject: RE: State Farm v. Metro Pain Specialists P.C., et al. - 1:21-cv-05523 (E.D.N.Y.) - Defendants ESI Production

Counsel:

I write to produce the second batch of ESI documents on behalf of defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA. There will be additional productions coming. Link below, and password coming in a separate email.

Anthony

https://app.everlaw.com/51126/dl/KBc11TxBlwWjSsbqZnhvgGA7GX4ZnWeRbz4JiSwE_SoM

From: Juliano, Anthony M. <ajuliano@bracheichler.com>

Sent: Friday, May 24, 2024 1:32 PM

To: Cardoza, Michael L. <michael.cardoza@katten.com>; 'Joseph D'Agostino' <JDAgostino@fdnylawfirm.com>; Peter Birzon <pbirzon@pbalaw.net>; 'Byron Divins' <bdivins@capetoladivinslaw.com>; 'Thomas A. Leghorn' <tleghorn@londonfischer.com>; 'Benjamin M. Pinczewski' <bmp@psattorney.com>; Alexandra Mule <amule@capetoladivinslaw.com>; aja@schlawpc.com; ozareh@wzmplaw.com; Ross Keiser <rkeiser@londonfischer.com>; Elyse Schindel <eschindel@londonfischer.com>; mac@schlawpc.com; reh@schlawpc.com; NTorczyner@hkplaw.com; sharfenist@hkplaw.com; Connor McHugh <cMcHugh@fdnylawfirm.com>; 'Jake Lader' <jlader@hkplaw.com>

Cc: Cook, Christopher T. <christopher.cook@katten.com>; DeYoung, Stephen P. <stephen.deyoung@katten.com>; Scruton, Sarah M. <sarah.scruton@katten.com>; Marks, Jonathan L. <jonathan.marks@katten.com>

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Anthony

<https://app.everlaw.com/51126/dl/u3ABA5LKWj6HhOB31uGrXKKqqPmM1DaWAYL9lb9IUeBI>

From: Cardoza, Michael L. <michael.cardoza@katten.com>

Sent: Monday, May 20, 2024 7:25 PM

To: Juliano, Anthony M. <ajuliano@bracheichler.com>; 'Joseph D'Agostino' <JDAgostino@fdnylawfirm.com>; Peter Birzon <pbirzon@pbalaw.net>; 'Byron Divins' <bdivins@capetoladivinslaw.com>; 'Thomas A. Leghorn' <tleghorn@londonfischer.com>; 'Benjamin M. Pinczewski' <bmp@psattorney.com>; Alexandra Mule <amule@capetoladivinslaw.com>; aja@schlawpc.com; ozareh@wzmplaw.com; Ross Keiser <rkeiser@londonfischer.com>; Elyse Schindel <eschindel@londonfischer.com>; mac@schlawpc.com; reh@schlawpc.com; Greydak, Joanna <jgreydak@bracheichler.com>; Roberts, Keith J. <kroberts@bracheichler.com>; NTorczyner@hkplaw.com; sharfenist@hkplaw.com; Carroll, Shannon <scarroll@bracheichler.com>; Connor McHugh <cMcHugh@fdnylawfirm.com>; 'Jake Lader' <jlader@hkplaw.com>

Cc: Cook, Christopher T. <christopher.cook@katten.com>; DeYoung, Stephen P. <stephen.deyoung@katten.com>; Scruton, Sarah M. <sarah.scruton@katten.com>; Marks, Jonathan L. <jonathan.marks@katten.com>; Cardoza, Michael L. <michael.cardoza@katten.com>

Subject: [EXTERNAL] State Farm v. Metro Pain Specialists P.C., et al. - 1:21-cv-05523 (E.D.N.Y.) - Google Third Party Production

Counsel,

On behalf of the Plaintiffs, I write to provide documents recently produced by third parties pursuant to the Rule 45 Subpoenas served in this case. The third party records in this production also contain information responsive to and supplemental to Plaintiffs' discovery responses, and are thus being produced pursuant to Fed. R. Civ. P. 26(e).

We are producing these documents via Dropbox/FTP in the link below. Please note that the production files are encrypted and we will send the password by e-mail under separate cover.

<https://files.katten.com/pickup.php?claimID=5EYpMuXRJXfW9hCR&claimPasscode=ie7sDNqgkMb8erfw&emailAddr=103274>

The documents contained within this set bear Bates numbers GOOGLE000001 - GOOGLE231460.

Thanks,

Michael L. Cardoza

Associate

Katten

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NOTIFICATION: Katten Muchin Rosenman LLP is an Illinois limited liability partnership that has elected to be governed by the Illinois Uniform Partnership Act (1997).

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Anthony Juliano

973-403-3154

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